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June 20, 2023

VIA E-MAIL to “transcom.scott.tcja.mbx.foia@mail.mil”
USTRANSCOM/TCJA-FO
Attn: FOIA Officer
508 Scott Drive
Scott AFB IL 62225-5357

Re: Crowley Maritime DFTS Sex Trafficking Records & Communications

FOIA Officer,

This letter constitutes a request under the Freedom of Information Act (“FOIA”) and is submitted on behalf of Maritime Legal Solutions, PLLC (“MLS”) to the United States Transportation Command (“USTRANSCOM”).

Background:

MLS represents two former female employees of Crowley Maritime Corporation (“Crowley”) who have filed sex trafficking and forced labor lawsuits against Crowley in the U.S. District Court for the Middle District of Florida.

Both of our clients allege that they were sexually trafficked and sexually abused while participating in Crowley’s implementation of the Defense Freight Transportation Services (“DFTS”) contract, which was awarded to Crowley by USTRANSCOM.

The two cases are titled:

1. Treminio v. Crowley Maritime Corp., et al., Case No. 3:22-cv-174-MMH-PDB
2. Jane Doe #1 v. Crowley Maritime Corp., et al., Case No. 3:23-cv-00383-MMH-JBT

Records held by USTRANSCOM related to Crowley's implementation of the DFTS contract are relevant to the claims our clients have made against Crowley in both cases.

Therefore, pursuant to the Freedom of Information Act, 5 U.S.C. § 552, MLS respectfully requests the following information from USTRANSCOM:

Records Requested:

1. The complete DFTS contract between Crowley Maritime Corporation and USTRANSCOM.
2. All electronic or other communications, including emails, between USTRANSCOM and Crowley Maritime Corporation, regarding allegations of human trafficking, sexual trafficking, sex trafficking, forced labor, sexual abuse, rape, or sexual assault occurring within the implementation of the DFTS contract. Date Range: November 1, 2016 through the date this FOIA Request is fully processed.
3. All records or internal electronic communications, including emails, between employees or agents off USTRANSCOM and other employees and agents of USTRANSCOM (including civilian employees as well as active duty members of the military affiliated with USTRANSCOM), that reference allegations of human trafficking, sexual trafficking, sex trafficking, forced labor, sexual abuse, rape, or sexual assault occurring within Crowley Maritime Corporation's implementation of the DFTS contract. Date Range: November 1, 2016 through the date this FOIA Request is fully processed.
4. All records or electronic communications, including emails, sent or received by USTRANSCOM Contracting Officer Mr. Christopher Frost, that reference allegations of human trafficking, sexual trafficking, sex trafficking, forced labor, sexual abuse, rape, or sexual assault occurring within Crowley Maritime Corporation's implementation of the DFTS contract. Date Range: November 1, 2016 through the date this FOIA Request is fully processed.
5. All records of any kind held by USTRANSCOM that reference allegations of human trafficking, sexual trafficking, sex trafficking, forced labor, sexual abuse, rape, or sexual assault occurring within Crowley Maritime Corporation's

implementation of the DFTS contract. Date Range: November 1, 2016 through the date this FOIA Request is fully processed.

6. All complaints, notices, or reports of any kind, including whistleblower complaints, received by USTRANSCOM (or in the possession of USTRANSCOM) regarding Crowley Maritime Corporation's implementation of the DFTS contract. Date Range: November 1, 2016 through the date this FOIA Request is fully processed.
7. All records, complaints, notices, or reports of any kind, including whistleblower complaints or reports, received by USTRANSCOM (or in the possession of USTRANSCOM) regarding any allegations of human trafficking, sexual trafficking, sex trafficking, forced labor, sexual abuse, rape, or sexual assault occurring within the implementation of any USTRANSCOM-administered contract. Date Range: January 1, 2000 through the date this FOIA Request is fully processed.
8. All records related to any investigations of any allegations of human trafficking, sexual trafficking, sex trafficking, or forced labor occurring within the implementation of any USTRANSCOM-administered contract. Date Range: January 1, 2000 through the date this FOIA Request is fully processed.

Fees:

We are willing to pay reasonable costs for processing this request, up to \$1,000.

Conclusion:

Thank you for your consideration of this request. For questions regarding this request, I can be contacted via email at help@justiceformariners.com

Respectfully Submitted,

/JRM/

J. Ryan Melogy, Esq.
Maritime Legal Solutions, PLLC